

**Theodore J. Folkman**

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**From:** Theodore J. Folkman  
**Sent:** Friday, May 10, 2024 3:54 PM  
**To:** Connie Dai  
**Subject:** Docs  
**Attachments:** Sun - Certificate of Enforceability.PDF; Sun - Fully Authenticated Judgment.PDF

Hi, Connie,

Thanks for the call today. Here are the documents I referenced—the fully authenticated versions of the Chinese judgment and the certificate of enforceability.

Early next week, would you please send me some times we could speak about the matters I raised in my letter? As I mentioned on the phone, what I am really getting at is this: now that the judgment has been fully authenticated and all the necessary certificates have been obtained, is there any other reason why you say the judgment should not be recognized in Massachusetts? If so, what are they, and why? For your reference, the judgment recognition statute, G.L. c. 235, § 23A requires that the judgment must be final and conclusive, and it contains a list of seven reasons why a judgment should not be recognized. Which of these reasons, if any, do you say apply, and if so, what is your factual basis?

Thanks, I look forward to speaking next week

Best,

Ted

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